IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:

MINING PROJECT WIND DOWN HOLDINGS, INC. (f/k/a Compute North Holdings, Inc.), *et al.*,

Reorganized Debtors.

TRIBOLET ADVISORS LLC, in its capacity as Plan Administrator and Trustee for the Mining Project Wind Down Holdings, Inc. Litigation Trust,

Plaintiff,

v.

CORPUS CHRISTI ENERGY PARK, LLC and BOOTSTRAP ENERGY, LLC,

Defendants.

Chapter 11

Case No. 22-90273 (MI)

(Jointly Administered)

Adv. Pro. No. 23-03210

JOINT MOTION FOR CONTINUANCE AND FOR ENTRY OF AGREED AMENDED SCHEDULING ORDER

Plaintiff Tribolet Advisors LLC, in its capacity as Plan Administrator and Trustee for the Mining Project Wind Down Holding, Inc. Litigation Trust and Defendants Corpus Christi Energy Park, LLC and Bootstrap Energy, LLC, file this Joint Motion for Continuance and Entry of Agreed Amended Scheduling Order and respectfully show the Court as follows:

- 1. Plaintiff Tribolet Advisors LLC filed this case on September 19, 2023.
- Defendants Corpus Christi Energy Park, LLC, and Bootstrap Energy, LLC filed their Motion to Dismiss and Original Answer on October 23, 2023.

- 3. On April 8, 2024, the Court entered its Order on the Motion to Dismiss. On April 22, 2024, Defendants filed their First Amended Answer and Counterclaim with the Court.
- 4. The Court entered an Agreed Scheduling Order on May 21, 2024, setting this case for trial on February 5, 2025.
- 5. Following the resolution of the Motion to Dismiss, the parties conducted but have not completed discovery.
- 6. The parties therefore request a limited continuance of the February 5, 2025, trial date to May 19, 2025 and continuing through May 21, 2025, and a corresponding reset of all pretrial deadlines and settings via entry of the attached Agreed Amended Discovery Plan & Scheduling Order.
- 7. This continuance is not sought to delay the trial but to ensure the parties may complete discovery and prepare for trial.

WHEREFORE, Plaintiff Tribolet Advisors LLC, and Defendants Corpus Christi Energy Park, LLC and Bootstrap Energy, LLC jointly request that the Court continue the trial setting, set the case for trial on May 19, 2025, and enter the attached Agreed Amended Discovery Plan & Scheduling Order.

Dated: October 21, 2024 Respectfully submitted by:

<u>/s/ Debbie E. Green - signed with permission</u>

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